

Exhibit 6

From: SALEM, Sara
To: Wolin, Michael (ATR); Milligan, Heather C; Garcia, Kelly (ATR); Teitelbaum, Aaron (ATR); Wood, Julia (ATR); Vernon, Jeffrey (ATR); Mene, Gerard (USAVAE); Strick, Amanda (ATR); Choi, Stephanie (ATR); a Ferguson@oag.state.va.us; spopps@oag.state.va.us; thenry@oag.state.va.us; kgallagher@oag.state.va.us; Brian Wang; Lauren Pomeroy; Paula Blizzard; bryn.williams@coag.gov; jan.zavislan@coag.gov; steve.kaufmann@coag.gov; nicole.demers@ct.gov; yale.leber@law.njoag.gov; elinor.hoffmann@ag.ny.gov; morgan.feder@ag.ny.gov; locean@riag.ri.gov; david.mcdowell@ag.tn.gov; ethan.bowers@ag.tn.gov; tyler.corcoran@ag.tn.gov; Elizabeth.Maxeiner@ilag.gov; jayme.weber@azag.gov; amy.hanson@atg.wa.gov; brandon.h.garod@doj.nh.gov; james.r.davis@doj.nh.gov; Douglas.L.Davis@wvago.gov; joseph.conrad@nebraska.gov; jmcghee@ncdoj.gov; jmarx@ncdoj.gov; kchoksi@ncdoj.gov; tyler.arnold@atg.wa.gov; kate.iiams@atg.wa.gov
Cc: MCCALLUM, Robert; dpearl@axinn.com; Daniel Bitton; dpearl@axinn.com; Erickson, Christopher; craig.reilly@ccreillylaw.com; BAYOUMI, Jeanette; MAHR, Eric (EJM); ELMER, Julie (JSE); EWALT, Andrew (AJE); GARRETT, Tyler; KAPLIN, Lauren; TU, Xiaoxi; Bradley Justus; Amy Mauser; GRP-Google-AdTech-EXTERNAL; SVENSON, Ross; ZHANG, Lijun
Subject: [EXTERNAL] RE: United States et al v. Google LLC, 1:23-cv-00108-LMB-JFA (E.D. Va.) - Service of Google's Sealed Filings
Date: Wednesday, September 13, 2023 9:47:29 AM

Michael,

Plaintiffs' RFP No. 4 seeks "[a]ll communications between Google (including its outside counsel) and any non-Google party (including the party's counsel) related to this Litigation or Investigation or the Multidistrict Litigation," Google objected to that request as vague, overbroad, and unduly burdensome but agreed to produce "the subpoenas, and any modifications thereto, in response to which third parties produce the documents that Google has agreed to produce in response to Request 3." That is what Google has been doing.

As you know, Plaintiffs propounded RFP No. 64 on May 23, 2023. RFP No. 64 requested, "[a]ll documents relating to communications with any Potential Witness [defined to include, among other things, all individuals and entities (including their employees) identified on both parties' initial disclosures], during the period from January 1, 2023 to September 7, 2023." Google objected to RFP No. 64 on multiple grounds, including on the ground that seeking all documents relating to communications, including ordinary course commercial communications, between Google and thousands of unnamed persons is overbroad, unduly burdensome, and disproportionate to the needs of the case. See 6.7.2023 Google's Objections to Plaintiffs' Sixth Set of Requests for Production; 6.22.2023 Google's Responses to Plaintiffs' Sixth Set of Requests for Production. Google reiterated this point in the July 27 email you refer to. Google also objected to RFP No. 64 as duplicative to the extent it "seeks communications with subpoena recipients that Google has *already agreed* to produce in response to [RFP No. 4]." *Id.* (emphasis added). Google's Responses and Objections thus reiterated that it intended to provide the third-party communications described in Google's Response to Plaintiffs' RFP No. 4.

Please let us know of any other questions.

Best,
 Sara

Sara Salem

Associate

T +1 202 777 4529 | M +1 202 853 0381

From: Wolin, Michael (ATR) <Michael.Wolin@usdoj.gov>

Sent: Tuesday, September 12, 2023 4:48 PM

To: Milligan, Heather C <hmilligan@paulweiss.com>; Garcia, Kelly (ATR) <Kelly.Garcia@usdoj.gov>; Teitelbaum, Aaron (ATR) <Aaron.Teitelbaum@usdoj.gov>; Wood, Julia (ATR) <Julia.Tarver.Wood@usdoj.gov>; Vernon, Jeffrey (ATR) <Jeffrey.Vernon@usdoj.gov>; Mene, Gerard (USAVAE) <Gerard.Mene@usdoj.gov>; Strick, Amanda (ATR) <Amanda.Strick@usdoj.gov>; Choi,

Stephanie (ATR) <Stephanie.Choi@usdoj.gov>; aferguson@oag.state.va.us; spopps@oag.state.va.us; thenry@oag.state.va.us; kgallagher@oag.state.va.us; Brian Wang <Brian.Wang@doj.ca.gov>; Lauren Pomeroy <Lauren.Pomeroy@doj.ca.gov>; Paula Blizzard <Paula.Blizzard@doj.ca.gov>; bryn.williams@coag.gov; jan.zavislan@coag.gov; steve.kaufmann@coag.gov; nicole.demers@ct.gov; yale.leber@law.njoag.gov; elinor.hoffmann@ag.ny.gov; morgan.feder@ag.ny.gov; locean@riag.ri.gov; david.mcdowell@ag.tn.gov; ethan.bowers@ag.tn.gov; tyler.corcoran@ag.tn.gov; Elizabeth.Maxeiner@ilag.gov; jayme.weber@azag.gov; amy.hanson@atg.wa.gov; brandon.h.garod@doj.nh.gov; james.r.davis@doj.nh.gov; Douglas.L.Davis@wvago.gov; joseph.conrad@nebraska.gov; jmcghee@ncdoj.gov; jmarx@ncdoj.gov; kchoksi@ncdoj.gov; tyler.arnold@atg.wa.gov; kate.iiams@atg.wa.gov

Cc: MCCALLUM, Robert <rob.mccallum@freshfields.com>; SALEM, Sara <Sara.Salem@freshfields.com>; dpearl@axinn.com; Daniel Bitton <dbitton@axinn.com>; dpearl@axinn.com; Erickson, Christopher <cerickson@axinn.com>; craig.reilly@ccreillylaw.com; BAYOUMI, Jeanette <Jeanette.Bayoumi@freshfields.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; KAPLIN, Lauren <lauren.kaplin@freshfields.com>; TU, Xiaoxi <Xiaoxi.Tu@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Amy Mauser <amauser@paulweiss.com>; GRP-Google-AdTech-EXTERNAL <GRP-Google-AdTech-EXTERNAL@paulweiss.com>; Wolin, Michael (ATR) <Michael.Wolin@usdoj.gov>

Subject: RE: United States et al v. Google LLC, 1:23-cv-00108-LMB-JFA (E.D. Va.) - Service of Google's Sealed Filings

Counsel,

Please respond to my questions below as soon as possible and no later than 10:00am tomorrow, September 13. This information is directly relevant to the motion you filed seeking relief from the Court, to which our response is due tomorrow afternoon.

Regards,
Michael

Michael Wolin (he/him)

Trial Attorney

United States Department of Justice

Antitrust Division | Transportation, Energy, and Agriculture Section

450 Fifth Street N.W., Suite 8000, Washington, DC 20530

michael.wolin@usdoj.gov | (202) 704-3270 (mobile)

From: Wolin, Michael (ATR) <Michael.Wolin@usdoj.gov>

Sent: Monday, September 11, 2023 12:47 PM

To: Milligan, Heather C <hmilligan@paulweiss.com>; Garcia, Kelly (ATR) <Kelly.Garcia@usdoj.gov>; Teitelbaum, Aaron (ATR) <Aaron.Teitelbaum@usdoj.gov>; Wood, Julia (ATR) <Julia.Tarver.Wood@usdoj.gov>; Vernon, Jeffrey (ATR) <Jeffrey.Vernon@usdoj.gov>; Mene, Gerard

(USAVAE) <GMene@usa.doj.gov>; Strick, Amanda (ATR) <Amanda.Strick@usdoj.gov>; Choi, Stephanie (ATR) <Stephanie.Choi@usdoj.gov>; aferguson@oag.state.va.us; spopps@oag.state.va.us; thenry@oag.state.va.us; kgallagher@oag.state.va.us; Brian Wang <Brian.Wang@doj.ca.gov>; Lauren Pomeroy <Lauren.Pomeroy@doj.ca.gov>; Paula Blizzard <Paula.Blizzard@doj.ca.gov>; bryn.williams@coag.gov; jan.zavislan@coag.gov; steve.kaufmann@coag.gov; nicole.demers@ct.gov; yale.leber@law.njoag.gov; elinor.hoffmann@ag.ny.gov; morgan.feder@ag.ny.gov; locean@riag.ri.gov; david.mcdowell@ag.tn.gov; ethan.bowers@ag.tn.gov; tyler.corcoran@ag.tn.gov; Elizabeth.Maxeiner@ilag.gov; jayme.weber@azag.gov; amy.hanson@atg.wa.gov; brandon.h.garod@doj.nh.gov; james.r.davis@doj.nh.gov; Douglas.L.Davis@wvago.gov; joseph.conrad@nebraska.gov; jmcghee@ncdoj.gov; jmarx@ncdoj.gov; kchoksi@ncdoj.gov; tyler.arnold@atg.wa.gov; kate.iiams@atg.wa.gov

Cc: Robert McCallum <rob.mccallum@freshfields.com>; Sara.Salem@freshfields.com; dpearl@axinn.com; Daniel Bitton <dbitton@axinn.com>; Pearl, David <dpearl@axinn.com>; Erickson, Christopher <cerickson@axinn.com>; craig.reilly@ccreillylaw.com; Jeanette Bayoumi <Jeanette.Bayoumi@freshfields.com>; Eric Mahr <Eric.MAHR@freshfields.com>; Julie Elmer <Julie.Elmer@freshfields.com>; Andrew Ewalt <Andrew.Ewalt@freshfields.com>; Tyler Garrett <Tyler.Garrett@freshfields.com>; Lauren Kaplin <lauren.kaplin@freshfields.com>; TU, Xiaoxi <Xiaoxi.Tu@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Mauser, Amy <amauser@paulweiss.com>; GRP-Google-AdTech-EXTERNAL <GRP-Google-AdTech-EXTERNAL@paulweiss.com>; Wolin, Michael (ATR) <Michael.Wolin@usdoj.gov>

Subject: RE: United States et al v. Google LLC, 1:23-cv-00108-LMB-JFA (E.D. Va.) - Service of Google's Sealed Filings

Counsel,

You state on page 28 of your motion that “Google is producing its outside counsels’ communications with third parties through August 25.” So that we may fully consider your motion and potentially limit the areas of disagreement requiring intervention by the Court, please:

- Confirm Google is producing all communications between its outside counsel and third parties through August 25 related to this litigation or the subject matter thereof, and is not limiting its production to any subset of such communications. In particular, confirm that Google has not limited this production solely to communications negotiating the scope of third-party subpoena responses.
- Confirm Google has completed its production of outside counsel communications with third parties through August 25.
- Confirm when, if ever, Google informed Plaintiffs that it would be producing third-party communications through August 25, a change from Google’s position on July 27 that producing such communications in response to Plaintiffs’ RFP 64 would be “unduly burdensome and disproportionate to the needs of the case.”

Regards,
Michael Wolin

Michael Wolin (he/him)

Trial Attorney
United States Department of Justice
Antitrust Division | Transportation, Energy, and Agriculture Section
450 Fifth Street N.W., Suite 8000, Washington, DC 20530
michael.wolin@usdoj.gov | (202) 704-3270 (mobile)

From: Milligan, Heather C <hmilligan@paulweiss.com>

Sent: Friday, September 8, 2023 5:02 PM

To: Garcia, Kelly (ATR) <Kelly.Garcia@usdoj.gov>; Teitelbaum, Aaron (ATR) <Aaron.Teitelbaum@usdoj.gov>; Wood, Julia (ATR) <Julia.Tarver.Wood@usdoj.gov>; Vernon, Jeffrey (ATR) <Jeffrey.Vernon@usdoj.gov>; Mene, Gerard (USAVAE) <GMene@usa.doj.gov>; Wolin, Michael (ATR) <Michael.Wolin@usdoj.gov>; Strick, Amanda (ATR) <Amanda.Strick@usdoj.gov>; Choi, Stephanie (ATR) <Stephanie.Choi@usdoj.gov>; aferguson@oag.state.va.us; spopps@oag.state.va.us; thenry@oag.state.va.us; kgallagher@oag.state.va.us; Brian Wang <Brian.Wang@doj.ca.gov>; Lauren Pomeroy <Lauren.Pomeroy@doj.ca.gov>; Paula Blizzard <Paula.Blizzard@doj.ca.gov>; bryn.williams@coag.gov; jan.zavislan@coag.gov; steve.kaufmann@coag.gov; nicole.demers@ct.gov; yale.leber@law.njoag.gov; elinor.hoffmann@ag.ny.gov; morgan.feder@ag.ny.gov; locean@riag.ri.gov; david.mcdowell@ag.tn.gov; ethan.bowers@ag.tn.gov; tyler.corcoran@ag.tn.gov; Elizabeth.Maxeiner@ilag.gov; jayme.weber@azag.gov; amy.hanson@atg.wa.gov; brandon.h.garod@doj.nh.gov; james.r.davis@doj.nh.gov; Douglas.L.Davis@wvago.gov; joseph.conrad@nebraska.gov; jmcghee@ncdoj.gov; jmarx@ncdoj.gov; kchoksi@ncdoj.gov; tyler.arnold@atg.wa.gov; kate.iiams@atg.wa.gov

Cc: Robert McCallum <rob.mccallum@freshfields.com>; Sara.Salem@freshfields.com; dpearl@axinn.com; Daniel Bitton <dbitton@axinn.com>; Pearl, David <dpearl@axinn.com>; Erickson, Christopher <cerickson@axinn.com>; craig.reilly@ccreillylaw.com; Jeanette Bayoumi <Jeanette.Bayoumi@freshfields.com>; Eric Mahr <Eric.MAHR@freshfields.com>; Julie Elmer <Julie.Elmer@freshfields.com>; Andrew Ewalt <Andrew.Ewalt@freshfields.com>; Tyler Garrett <Tyler.Garrett@freshfields.com>; Lauren Kaplin <lauren.kaplin@freshfields.com>; TU, Xiaoxi <Xiaoxi.Tu@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Mauser, Amy <amauser@paulweiss.com>; GRP-Google-AdTech-EXTERNAL <GRP-Google-AdTech-EXTERNAL@paulweiss.com>

Subject: [EXTERNAL] United States et al v. Google LLC, 1:23-cv-00108-LMB-JFA (E.D. Va.) - Service of Google's Sealed Filings

Counsel:

Attached for service, please find sealed filings of the following:

- 2023.09.08 Google's Memorandum in Support of its Motion to Compel
 - Appendix in Support of its Motion to Compel
 - Exhibits 1, 5, 9, 10, and 11 to Google's Memorandum in Support of its Motion to Compel

Regards,

Heather

Heather C Milligan | Associate

Paul, Weiss, Rifkind, Wharton & Garrison LLP

2001 K Street, NW | Washington, DC 20006-1047

202 223 7465 (Direct Phone) | 508 332 0759 (Cell)

hmilligan@paulweiss.com | www.paulweiss.com

Pronouns: She/Her/Hers

This message is intended only for the use of the Addressee and may contain information that is privileged and confidential. If you are not the intended recipient, you are hereby notified that any dissemination of this communication is strictly prohibited. If you have received this communication in error, please erase all copies of the message and its attachments and notify us immediately.

This e-mail is confidential and may be legally privileged. If you have received it in error, you are on notice of its status. Please notify us immediately by reply e-mail and then delete this message from your system. Please do not copy it, use it for any purpose or disclose its contents to any other person; to do so could be a breach of confidentiality. Thank you for your cooperation. Please contact our IT Helpdesk at GlobalITServiceDesk@freshfields.com if you need assistance.

Freshfields Bruckhaus Deringer US LLP has offices in New York, Silicon Valley and Washington, DC. Freshfields Bruckhaus Deringer LLP is a limited liability partnership registered in England and Wales with registered number OC334789, and has offices or associated entities in Austria, Bahrain, Belgium, China, England, France, Germany, Hong Kong, Italy, Japan, the Netherlands, Singapore, Spain, the United Arab Emirates and Vietnam.

Any reference to a partner means a member, or a consultant or employee with equivalent standing and qualifications, of Freshfields Bruckhaus Deringer US LLP, Freshfields Bruckhaus Deringer LLP or any associated firms or entities.

For information about how Freshfields Bruckhaus Deringer processes personal data please refer to this [Privacy notice](#). For further information about Freshfields Bruckhaus Deringer, please refer to our website at www.freshfields.com.